

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

SAMUEL BENJAMIN MUNOZ AVILA

DEBTOR

CASE NO. 14-08466-MCF

CHAPTER 13

**OBJECTION TO CLAIM NUMBER 1-1
BY ASUME**

TO THE HONORABLE COURT:

NOW COMES, SAMUEL BENJAMIN MUNOZ AVILA, debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. That ASUME filed a proof of claim number 1-1, in the total amount of \$10,667.47, classified as priority.

2. That claim number 1-1 is hereby objected on the grounds that the sum claimed by ASUME is not the correct amount owed by the debtor.

3. The debtor hereby respectfully submits that on September 10, 2014, he made one (1) \$4,844.89 payment reducing the amount owed to \$5,822.58. Attached is evidence of the payment made on September 10, 2014.

4. Based on the above-mentioned, debtor requests that claim number 1-1 filed by ASUME **be reduced to the amount of \$5,822.58.**

WHEREFORE, the debtor requests this motion be granted, and that proof of claim number 1-1 be reduced to the sum of \$5,822.58.

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Debtor's Objection to Claim
Case no. 14-08466-MCF13

NOTICE

Within thirty (30) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE: I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of the same to Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to: ASUME, PO Box 71316 San Juan, PR 00936-8416; and debtor, Samuel Benjamin Munoz Avila, to his address of record: PMB 1295 Box 6400 Cayey, PR 00736.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 9th day of January, 2015.

/s/Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
ATTORNEY FOR PETITIONERS
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PO BOX 186 CAGUAS PR 00726-0186
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SC 782 (OAT-1263) Mayo 2001		ESTADO LIBRE ASOCIADO DE PUERTO RICO TRIBUNAL GENERAL DE JUSTICIA		3381			
SECRETARIA CIVIL (BRF) Sala de Bayamón		RECIBO OFICIAL		RECIBO NUMERO 3381		FECHA 10/sep/2014	
AWILDA MORALES RODRIGUEZ		RECIBE DE		FORMA DE PAGO			
IMPORTE 4,844.89		Cheque 103132100022928					
cuatro mil ochocientos cuarenta y cuatro y 89 / 100		DESCGLOSE 4,844.89		CUENTA BANCARIA 3004482319			
CONCEPTO Fianzas y Depósitos		NOMBRE Y FIRMA RECAUDADOR AUXILIAR					
INFORMACION DEL CASO 90822							
DSDI-1997-00318							
Demandante: LORENA SOTO VAZQUEZ							
Demandado: SAMUEL B. MUÑOZ AVILA							
DIVORCIO							
PENSION ALIMENTARIA							

Evelyn Maysonet Navedo
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